

September 15, 2016

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Wireless Emergency Alerts – PS Docket # 15-91

Dear Ms. Dortch:

On September 13, 2016, Keith Kaczmarek, inPhase Wireless, and Christopher Guttman-McCabe, CGM Advisors, LLC had separate discussions with Jessica Almond, Legal Advisor, Media, Public Safety and Enforcement in the Office of Chairman Wheeler, Brendan Carr, Legal Advisor, Wireless, Public Safety and International in the Office of Commissioner Pai, Erin McGrath, Legal Advisor, Wireless, Public Safety and International in the Office of Commissioner O’Rielly, and Johanna Thomas, Legal Advisor, Wireless, International and Public Safety in the Office of Commissioner Rosenworcel. In each of the discussions, Mr. Kaczmarek participated via conference call. Mr. Kaczmarek and Mr. Guttman-McCabe both also spoke via conference call with Daudeline Meme, Legal Advisor, Wireless, International and Public Safety in the Office of Commissioner Clyburn and Kelsie Rutherford, an intern in the Office of Commissioner Clyburn. All of the conversations focused on the Commission’s Wireless Emergency Alert (WEA) proceeding. In particular, the participants discussed the significant range of benefits that would flow to citizens and public safety alert originators from incorporating a device enhanced capability into the upcoming WEA Order. Mr. Kaczmarek also discussed how the WEA handset capabilities can, and should, be designed to limit the impact on mobile networks. The participants also discussed how a revenue opportunity could help offset the cost of WEA and drive additional investment and innovation into the wireless alerting service.

The discussions centered on a device enhanced WEA service and how incorporating the intelligence of the device into the WEA Order will unlock a wide range of benefits to consumers while balancing the desire to limit impact on the mobile networks. Specifically, a device enhanced upgrade will:

- Improve significantly geo-targeting and geo-fencing, allowing an alert message to be delivered in urban AND rural areas to a very focused alert area, thereby delivering very pertinent and very targeted information to the public while reducing the impact on the network;
- Create a cost offset and revenue opportunity for wireless carriers, as the enhanced geo-targeting will allow for the development of a range of paid offerings;

- Address accessibility issues by allowing WEA to connect to approved elements of the application layer of the device and incorporate accessibility solutions like text to speech, font increase, special tones, etc.;
- Provide opportunities to imbed emergency information (e.g., pre-developed information about moving to higher ground in a flash flood, below ground in a tornado, etc.) into the software so as to reduce the need for URLs and thereby limit impact on the wireless networks;
- Deliver a level of certainty for alert originators, allowing them to have a strong sense of who will receive the message in spite of the differences in network deployments and network technologies;
- Display the alert on a map, showing where the device exists in the alert area, thereby making the alert more personal to the consumer, and increasing the likelihood that they will act on the alert information; and,
- Personalize the alert message, allowing for different languages if available, and different settings (font size, etc.).

If the WEA service can be upgraded to forward the alert coordinates from the wireless network to the mobile device, allow the device to utilize the coordinates to determine whether to render the alert on the device, and provide access to approved elements of the app layer (mapping, primary language choice, text to speech, etc.), the device can make the alert more personal and more actionable by displaying the alert and a map with the device's location, as well as incorporating the personal settings of the device including language of choice and accessibility solutions. This evolution is timely, and would be significant for public safety alert originators, while better educating our citizens in times of emergency.

If you have any questions, please feel free to contact me.

Sincerely,

/s/

Keith Kaczmarek